

Appln. No. 10/086,359  
Amdt. dated Dec. 20, 2005  
Reply to Office Action of Oct. 20, 2005  
Docket No. BOC9-2001-0018 (262)

### REMARKS/ARGUMENTS

These remarks are made in response to the Final Office Action of October 20, 2005 (Office Action). As this response is timely filed within the 3-month shortened statutory period, no fee is believed due.

In paragraph 6 of the Office Action, Claims 1-17 were rejected. Each of the claims was rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,658,414 to Bryan, *et al.* (hereinafter Bryan).

Applicants have amended independent Claim 1 to emphasize the subject matter of Applicants' invention. Applicants have amended independent Claim 9 to further emphasize certain aspects of Applicants' invention. As amended, independent Claim 9 expressly recites a speech recognition system that automatically generates a heading grammar. The claim amendments are fully supported throughout the Specification. (See, e.g., Specification, p. 6, line 27 - p. 7, line 2.) No new matter has been introduced by the claim amendments.

#### I. Applicants' Invention

It may be helpful to reiterate certain aspects of Applicants' invention prior to addressing the reference cited in the Office Action. One embodiment of the invention, typified by Claim 1, is a method of automatically generating a grammar for recognizing headings in a speech recognition system.

The method can include determining that at least one heading section is to be presented to a user and, based on the determination, automatically identifying within a data store one or more heading selections associated with a content item. Each heading selection is able to be used as a selection item for identifying the content item through a speech interface. The method also can include automatically extracting at least a first word from each identified heading selection, wherein the at least a first word extracted

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includes "n" words of the heading section, and wherein "n" is less than the total number of words in the heading selection.

The method further can include automatically generating a heading grammar by including each extracted word of the identified heading selections within the heading grammar. The identified headings can then, according to the method, be presented to the user. Additionally, the method can include speech recognizing a spoken user selection using said heading grammar.

## II. The Claims Define Over Bryan

Bryan is directed to a "system for generating and providing access to *end-user* definable voice portals." (Col. 7, lines 43-47.) (emphasis supplied.) The hallmark of the Bryan system is that it is the *end user* who generates, modifies, and accesses a particular end-user defined voice portal. (See Col. 7, lines 47-60; Col. 8, lines 13-15, Col. 9, lines 45-55; and Col. 10, lines 5-10; see also Abstract.)

Every facet of generating and modifying a voice portal with the Bryan system relies on user selection, including the user selecting a grammar. (See, e.g., Col. 9, lines 40-46.) The Bryan system is expressly distinguished from "conventional interactive voice systems" by its reliance on user selection. (Col. 9, line 61 - Col. 10, line 4.) This is fundamentally different from Applicant's invention, which automatically generates a heading grammar. Whereas the hallmark of the Bryan system is user selection, Applicants' invention relies on automatic steps that obviate the need for user selection. Because of this fundamental difference, Bryan fails to expressly or inherently teach the features recited in each of independent Claims 1, 9, and 10.

Bryan fails to teach, expressly or inherently, automatically identifying at least one heading selection associated with a content item, for example, as recited in each of the independent claims. In a portion cited in the Office Action, Bryan discloses assigning an

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"identifier" and presenting to a user a "template from [a] template database" based on the identifier. (Col. 9, lines 40-45.) Bryan expressly adds, however, that the template "prompts *the user*" who in response to the prompt selects the "grammar." This step in Bryan is intended to allow a user to associate different vocabulary words with different data sources. (Col. 9, lines 46-60.) User-required selection, however, has nothing to do with *automatic* identification, let alone the automatic identification within a data store of one or more heading selections, as expressly recited in each of the independent claims.

Bryan further fails to automatically extract at least a first word from each identified heading selection, as also recited in each of the independent claims. In yet another portion cited in the Office Action, Bryan discloses eliciting "*from the user* information regarding information sources, search keywords, search time windows, and audio macros for accessing search results" (Col. 8, lines 6-20.) (emphasis supplied.) In another cited portion, Bryan expressly states that the system provides the capability for "a user to specify his or her own grammar for accessing a voice portal and data sources to be associated with the voice portal." Col. 10, lines 5-10.) (emphasis supplied.) Thus, again, every facet of the Bryan system is oriented to user selection; nowhere is there automatic extraction of a word from an identified heading section as recited in each of the independent claims.

Bryan critically fails to *automatically* generate a heading grammar by including *automatically* extracted words within the heading grammar, as recited in each of the independent claims. In still another portion cited in the Office Action, Bryan discloses that the overarching purpose of the system is to achieve "end user generation, modification, and access to voice portals." In the other cited portions, as already noted, this includes the "user specify[ing] his or her own grammar." (Col. 10, lines 5-10.) Nowhere does Bryan remotely teach the idea of automatic generation of a heading grammar that includes automatically extracted words, as recited in the independent

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claims. More particularly, Bryan nowhere teaches, expressly or inherently, automatically extracting at least a first word from each identified heading selection, wherein the at least first word extracted includes "n" words of the heading section, and wherein "n" is less than the total number of words in the heading selection as expressly recited in the independent claims.

Bryan is fundamentally different from Applicants' invention in every facet and, accordingly, fails to teach every feature recited in independent Claims 1, 9, and 10. Applicants respectfully maintain, therefore, that independent Claims 1, 9, and 10 define over the prior art. Applicants further respectfully maintain that whereas each of the dependent claims recites additional features as well as those of the independent claims, dependent Claims 2-8, 11-17 likewise define over the prior art.

### CONCLUSION

Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. The Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

Date:December 20, 2005

  
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